

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

PRO SE PRISONER CIVIL RIGHTS COMPLAINT

JAMES EZELL III

Plaintiff's full name (Please print)

v.

Case No.

(To be filled out by Clerk's  
Office-only)

DAMON HININGER CEO OF CORE CIVIC, WARDEN JAMES

Defendant(s)' full name (Please print)

YATES OF D.C.F DEPUTY WARDEN GENTRY, D.W. PEREZ

GRIEVANCE COORDINATOR TERRY UNDERWOOD LAW LIB-

ARAY SUPERVISORS JESSICA PATTERSON Echo Maximum

Unit 4/M Tiffany Ade 4/M Shay Pfaff, 4/clerk Carla

Hoover "see Attachment names", Amended names"

For additional names please write "see attached" in the space  
above and attach an additional sheet of paper with the full list  
of names. The names listed in the above caption must be  
identical to those contained in Section IV, pursuant to Fed.  
R. Civ. P. 10(a).

**FILED**

DEC 18 2019

PATRICK KEANEY  
Clerk, U.S. District Court

By

Deputy Clerk

NOTICE

Federal Rule of Civil Procedure 5.2 and Local Civil Rule 5.3 address the privacy and security concerns resulting from public access to electronic court files. Under these rules, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Each claim you raise must be properly exhausted. If the evidence shows that you did not fully comply with an available prison grievance process prior to filing this lawsuit, the court may dismiss the unexhausted claim(s) or grant judgment against you. See 42 U.S.C. 1997e(a).

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

## I. JURISDICTION

Indicate below the federal legal basis for your claim, if known.

- ☒ 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Action under *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (federal defendants)

## II. PLAINTIFF INFORMATION

|                                    |             |                       |
|------------------------------------|-------------|-----------------------|
| <u>JAMES EZELL III</u>             |             | <u>JAMES R. EZELL</u> |
| Full name                          |             | Aliases               |
| <u>D.O.C 23737</u>                 |             |                       |
| Prisoner ID #                      |             |                       |
| <u>DAVIS CORRECTIONAL FACILITY</u> |             |                       |
| Place of Detention/Incarnation     |             |                       |
| <u>6888 EAST 133RD RD</u>          |             |                       |
| Institutional Address              |             |                       |
| <u>Holdenville</u>                 | <u>OKLA</u> | <u>74848</u>          |
| City                               | State       | Zip Code              |

## III. PRISONER STATUS

Indicate whether you are a prisoner or other confined person as follows:

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

#### IV. DEFENDANT(S)' INFORMATION

List the following information for each defendant. If the correct information is not provided, it could result in the delay or prevention of service. Make sure that the defendant(s) listed below are identical to those contained on the first page. Attach additional sheets of paper as necessary. Do not write on the backs of any additional sheets. See Local Civil Rule 5.2(a).

Defendant 1: DAMON HININGER ✓  
Full Name  
CEO OF CORQ CIVIC  
Current Job Title  
10 Burton Hills Blvd.  
Nashville TN 37215  
Current Work Address  
5561 Virginia Way Suite 110  
Brentwood, TN. 37027  
City State Zip Code

Defendant 2: JAMES YATES ✓  
Full Name  
WARDEN  
Current Job Title  
6888 E 133<sup>rd</sup> Rd  
Current Work Address  
Holdenville OK 74848  
City State Zip Code

Defendant 10: Scott Crow ✓

Interim Director

3400 Martin Luther King Ave. Okla. City OK. 73136

Defendant 11: Mark Knutson ✓

Designee

3400 Martin Luther King Ave. Okla City OK. 73136

Defendant 12: David Cincotta ✓

General Counsel D.D.C.

3400 Martin Luther King Ave. Okla City OK 73136

Defendant 13: JASON BRYANT ✓

WARDEN

JOSEPH HARP CORR. CENTER P.O. BOX 549 LEXINGTON OK 73051

Defendant 14: R. HODGSON ✓

CAPTAIN

J.C.C.C 216 N. Murray St. Helena OK. 73741

Defendant 15: Austin Parks ✓

L.T.

J.C.C.C 216 N. Murray St. Helena OK. 73741

Defendant 16: Walker ✓

CORRECTION OFFICER

J.C.C.C 216 N. Murray St. Helena OK. 73741

Defendant 17: JAMES NAIL ✓ CAPTAIN

J.C.C.C 216 N. Murray St. Helena OK. 73741

Plaintiff has attached exhibits 1) J.C.C.C grievance # 1860; exhibit 2) D.C.F grievance # 00104, exhibit 3) D.C.F grievance # 00170, exhibit 4) D.C.F grievance # 00236 exhibit 5) D.C.F grievance # 00144 exhibit 6) D.C.F grievance # 00299

Defendant 3: MR. GENTRY Deputy Warden ✓  
*Full Name*  
DEPUTY WARDEN  
*Current Job Title*  
6888 E 133<sup>rd</sup> Rd  
*Current Work Address*  
Holdenville OK 74848  
*City State Zip Code*

Defendant 4: MR. PEREZ Deputy Warden ✓  
*Full Name*  
DEPUTY WARDEN  
*Current Job Title*  
6888 E 133<sup>rd</sup> Rd  
*Current Work Address*  
Holdenville OK 74848  
*City State Zip Code*

Defendant 5: MS. TERRY UNDERWOOD ✓  
*Full Name*  
GRIEVANCE COORDINATOR  
*Current Job Title*  
6888 E 133<sup>rd</sup> Rd  
*Current Work Address*  
Holdenville OK 74848  
*City State Zip Code*

Ms. Pirece % , % Mr. Vance % Mr. Bullock,  
Mr. Adkins, % Mr. Andrew Smith, Sgt % Mr. Keys

NEW DEFENDANTS  
ONLY !

OKLAHOMA DEPARTMENT OF CORRECTION DIRECTOR,  
SCOTT CROW, DESIGNEE MARK KNUTSON, GENERAL  
COUNSEL DAVID CINCOTTA; JAMES CRABTREE  
CORRECTIONAL CENTER WARDEN JASON BRYANT  
CAPTAIN R. HODGSON, L.T. AUSTIN PARKS %  
WALKER and Disciplinary Officer Captain  
JAMES NAIL, JOHN DOES, JANE DOES et al.,

#### IV. ADDITIONAL DEFENDANT(S) INFORMATION

Defendant 6: JESSICA PATTERSON ✓

LAW LIBRARY SUPERVISORS "MEDIUM YARD"

D.C.F 6888 E. 133<sup>rd</sup> Rd

Holdenville OK 74848

Defendant 7: Tiffany Ade ✓

Echo Unit Manager

D.C.F 6888 E. 133<sup>rd</sup> Rd

Holdenville OK. 74848

Defendant 8: SHay Pfaff ✓

Echo Unit Case Manager

D.C.F 6888 E. 133<sup>rd</sup> Rd

Holdenville OK. 74848

Defendant 9: Carla Hoover ✓

Echo Unit Clerk / Notary Law Library

D.C.F 6888 E. 133<sup>rd</sup> Rd

Holdenville OK. 74848

CONT. page cover sheet.

CONT. page 4.



CONTINUE amended names D.C.F

New Defendant 18: Ms. Pirece

Correctional Officers

D.C.F 6888 E. 133<sup>rd</sup> Rd Holdenville OK. 74848

New Defendant 19: Mr. Vance

Correctional Officers

D.C.F 6888 E. 133<sup>rd</sup> Rd Holdenville OK. 74848

New Defendant 20: Mr. Bullock

Correctional Officers

D.C.F 6888 E. 133<sup>rd</sup> Rd Holdenville OK. 74848

New Defendant 21: Mr. Keys

Correctional Officers

D.C.F 6888 E. 133<sup>rd</sup> Rd Holdenville OK 74848

New Defendant 22: Mr. Adkins

Correctional Officers

D.C.F 6888 E. 133<sup>rd</sup> Rd Holdenville OK. 74848

Plaintiff has attached exhibits 12a) D.C.F grievance #00342 exhibit 13a)  
D.C.F grievance #00343 exhibit 14a) D.C.F grievance #00344 exhibit 15a) D.C.F  
grievance #00345 <sup>Offense Report</sup> exhibit 16a) D.C.F grievance #00401 exhibit 17a) D.C.F  
grievance #00342 exhibit 18) D.C.F grievance #00365, exhibit 19) affidavit  
exhibit. 20) affidavit, exhibit 21) affidavit

## V. STATEMENT OF CLAIMS

### A. Claim 1

Date(s) of occurrence: May 3, 2018

Place(s) of occurrence: JAMES CRABTREE CORRECTIONAL CENTER (J.C.C.C)

State which of your federal constitutional or federal statutory rights have been violated:

First, Eighth, and Fourteenth Amendment Right

*Briefly state the FACTS that support your case. Provide a short and plain statement of how each named defendant was personally involved in the violation of your constitutional rights and why you are entitled to relief from each named defendant. See Fed. R. Civ. P. 8(a). Do not cite case law.*

FACTS: On May 3, 2018 (Captain Hodgson) directed (L.T. Parks) to grab my arm through the food slot "pulled twisted and bent my right arm/wrist then cuffed it to the outside of the door/doorhandle while the rest of my body was inside the cell house in with another offender" I was sprayed stripped naked, I was wrote a misconduct name was forged by James Nall transferred to D.C.f Supermax the same day placed on F.B. maximum SHU". (Warden Jason Bryant w/James Nall.)

### B. Claim 2

Date(s) of occurrence: February 14, 2019, May 6, 2018 and March 9, 2019

Place(s) of occurrence: DAVIS CORRECTIONAL FACILITY ECHO MAXIMUM UNIT

State which of your federal constitutional or federal statutory rights have been violated:

First, Sixth and Fourteenth Amendment Rights

FACTS: Relevant issue in [D.C. 6:12-cv-00133-FHS-SPS] forms OP-030115 and [OP-030115, OP-030115] Ms. Carla Hoover was the same defendant responsible for the Echo Maximum Unit [Access to Courts]; On May 6, 2018 forms used provided on Echo February 14, 2019, March 9, 2019 provided by [Ms. Carla Hoover] Inmate Request, Request to Staff outdated OP-030115 Access to Court required it. The Actual Law Library Supervisors [Patterson] refused to contact the General Counsel to obtain Case law 04-2018-34 that relates to CV-2018-2277 forged documents by (J.C.C.C.).



V. Cont. A. Claim 1 FACTS:

While cuffed to doorhandle (Captain Hodgson) reached out and pulled at plaintiff shirt and <sup>said</sup> get naked I refused to come out situ cell #16 without video camera present finally (Captain Nall) came and placed me in a (extra) hot shower that activate pepper spray (Captain Nall) is the Disciplinary Officer that forged plaintiff name on the O.D.C Deposition Report and forged plaintiff name on Offense Report as the investigator (CV-2018-2277 Oklahoma County) (Jesse Baker) filed charges in (cf-2018-34 [Alfalfa County]) plaintiff was transferred from medium security to supermax security based on forged documents by James Nall, 5-3-18. Plaintiff is entitled to relief because due process was violated unnecessary force was use video camera would have prevent action taken.

cont. B. Claim 2 FACTS:

[Attention] plaintiff was being allowed to speak with an offender assigned on Echo Unit as Law Clerk from May, 2018 untrained in Law his assistance to find case law per DP-030115 was inadequate when (R.T.S) or I.R. was submitted to Law Library Supervisor up on Medium Yard plaintiff was denied access to court by Law Library Clerk posted on (Echo Unit U/C/m P. Faff) on Echo Charlie allowed this offender to denied access (U/m Ade) allowed this offender to denied access (No Law Library Supervisor) was ever posted on Echo Ms. Carla Hoover would providing wrong forms outdate assigned to acted as the (Law Library Supervisor) and assigned (Notary) untrained; plaintiff would receive retaliation from another prisoner assigned Law Clerk alleging what would happen to Snitches filing grievance plaintiff was threaten with Misconduct by (U/m Ade, U/m P. Faff) and Medium Yard (Law Library Supervisor Ms. Patterson) for lying to staff about denied access to courts from (Echo Unsupervisor Law Clerk) but (never received Misconduct) after proof found on video footage retaliation continued; therefore, those were threats to prevent plaintiff from filing grievances had plaintiff lie or misconduct would be written, <sup>Page 5</sup>

### C. Claim 3

Date(s) of occurrence: April 3, 2019 on [June 13, 2019] plaintiff signed

Place(s) of occurrence: DAVIS CORRECTIONAL FACILITY ECHO MAX UNIT EC

State which of your federal constitutional or federal statutory rights have been violated:

First and Fourteenth Amendment Rights

See Exhibit 3a) 1-3a) 5

FACTS: Grievance # 2019-1001-00170 was Granted by [Warden Yates] after further investigation by [Jessica Patterson] Law Library Supervisors on Medium Yard plaintiff did not receive misconduct for lying to staff, the Law Library Clerk was removed in (Later July 2019) no Law Library Supervisor has been trained and posted on Echo Maximum Unit with trained Law Clerks to meet and provide what is required Grievance # 2019-1001-00236 logged retaliation by Law Clerk

### D. Claim 4

see Ex. 4a) 3

Date(s) of occurrence: [June 24 2019]  
April 9, 2019; [August 6, 2019] Aug. 13, 19 and [Aug. 15, 19]

Place(s) of occurrence: DAVIS CORRECTIONAL FACILITY ECHO MAX UNIT EC

State which of your federal constitutional or federal statutory rights have been violated:

First, Fourteenth, Sixth Amendment Rights

FACTS: On 6-24-19 plaintiff submitted grievance with attached request to staff to [Ms. Underwood] the R.T.S was destroy # 00267 on [Ms. Patterson] denied access to court per order OP-03015 exhibit 10) On 8-5-2019 related grievance submitted to Ms. Underwood exhibit 7) returned August 13, 2019 by Ms. Underwood 00297 with 00299 Aug. 13, 2019 with the intent to destroy grievance appeal by not providing plaintiff the grievance restriction on Aug. 13, 19 as it is dated August 7, 2019 as 00297, 00299 has no (mailbox rule) grievance restriction provided August 15, 2019 it would take plaintiff 4 day from Aug. 15, 19 to obtain Notary 6 days would have past out of time before it reach (D.O.C. APH) Plaintiff had grievance restriction affidavit already logged. On August 20, 2019 and August 27, 2019 [Ms. Hoover] refused to Notary Grievance Restriction Affidavit per OP-090124 section IX., under direction of [Ms. Terry Underwood] G.C. Sept. 9, 2019 Original Complaint Filed



### V. Cont. C. Claim 3

after plaintiff proved the Denied access to L.T. Bowman after he reviewed video footage and directed the Law Clerk to provide extra time Yo Adkins and Echo Law Clerk took the computer and refused to feed plaintiff in Cage under direction of Ym Pfaff plaintiff exhibits 1-4 were submitted on wrong forms provided by Echo Unit/ Echo Unit Ms. Hoover these form are to be made ready available through Law Library per DP-030115 Access to Court is to provide Legal Services, Functions of the Access to Courts

Echo Unit Ym Pfaff, Ym Ade Ms. Hoover as well as Medium Yard Law Library Supervisor and Warden Yates for all offender, plaintiff "DP-030115 is attached to DP-090124 inadequate Law Library Services makes Offender Grievance Process inadequate.

### Cont. D. Claim 4

On October 14, 2019 doorside Echo Charlie 102 [Ms. Carla Hoover] came to EC-102 after request provided for Notary which she denied Notary again for grievance restriction affidavit stating you have filed a lawsuit on me before and also refuse to Notary affidavit addressed to eastern district on direction of [Diana Jones] continued to deny DP-030115 and DP-090124

On November 1, 2019 plaintiff called (Yo Ryan) to EA-219 requested him to call [Law Library Ms. Patterson] concerning my deadline under PC-208-819 Order that was previously provided Ms. Patterson denied Law Library access she stated PC-208-819 Order from D.C.O.A Jan. 8, 2019 plaintiff submitted a R.T.S per DP-090124 on [November 13, 2019 defendant Jessica Patterson] wrote plaintiff a misconduct [based on his litigation 6:19-cv-302-JHE-SPS] complaint, denying Law Library access to Courts.

CONT. page 6.

## E. Claim 5

Date(s) of occurrence: On June 26, 19, Sept. 12, 19, and October. 14, 2019  
November. 13, 2019

Place(s) of occurrence: On Echo Maximum Unit Echo Charlie, Echo Alf

State which of your federal constitutional or federal statutory right have been violated:

First, Sixth, Eighth and Fourteenth Amendment Rights

FACT: Echo Maximum Unit is without a Law Library that meets the requirement established in *Bound v. Smith* per OP-030115 Access to Court Medium Ward Law Library Supervisor Ms. Patterson failed to provide correct forms on Echo Unit Grievance Coordinator Ms. Underwood failed to provide correct forms on Echo Unit Unit Clerk Ms. Hoover has been assigned to provide forms on EC, EB, and EA units on Echo as well as notary per OP-030115 none of the above are trained in Law nor is there a trained Clerk assigned to Echo Maximum Unit; June 24, 19 plaintiff provided grievances to mailroom supervisor Ms. West with attached R.T.S on June 26, 2019 R.T.S was destroy by Ms. Underwood Ex. 11a)1 on August 20, 2019 Echo Unit assigned Notary Ms Hoover denied Notary under direction of Ms. Underwood, Deputy Warden Perez, and Deputy Warden Gentry as well as C.D.U.M Ms. Dorman directed Mailroom Supervisor Ms. West not to Notary for [Echo Maximum Unit], the Law Library Supervisor Ms. Patterson is not a Notary per OP-030115; On Sept. 12, 2019 Ms. Underwood returned 3 grievances submitted on August. 27, 2019 through Mailroom Supervisor Ms. West verified EX. 12a)1 EX. 13a)1 and EX. 14a)1 then retaliated on by issued misconduct on 8-27-19



Cont page 7.

The above denial, destroy grievance R.T.S attached DD267, DD268 and deliberately refused to log 3 grievances submitted timely on August 29, 2019 plaintiff right to exhaust grievances in order to petition the government under First Amendment Right and Fourteenth Amendment Right to equal protected rights and due process; First defendants Echo Unit team Ym Pfaff Ym Ade u/c Ms. Hoover deprived plaintiff from OP-D3015 access to court available forms Notary, Medium Yard Law Library Supervisor Ms. Patterson Denial of Access to Courts because she is untrained, denial of trained Law Clerk per Policy and Bounds v. Smith; Review Authority Grievance Coordinator Ms. Underwood directed Ms. Carla Hoover not to Notary Grievance Restriction Affidavit to prevent legal victory, equal opportunity as Medium Yard inmates that is allowed Notary, access to court in Law Library; [Warden James Yates] Letter of Grievance Restriction August 7, 2019 Ex. 7b)1 Ex. 7b)1.d.3, EX. 7b)4 affidavit and EX. 7b)5 affidavit Ex. 7b) cont. 5; [Deputy Warden Gentry] has intentionally directed Law Library Supervisor to Deny access to plaintiff even with active Deadline; On November 1, 2019 [Ms. Patterson] denied access to court stating plaintiff did not have deadline, on Nov. 4, 2019 plaintiff submitted R.T.S. to resolve issue per OP-00124 to Law Library Supervisor Ms. Patterson, November 7, 2019 plaintiff filed Motion For appointment of Counsel in Eastern District Court in CV-19-302; on Nov. 13 2019 Ms. Patterson wrote a disciplinary offense report based on plaintiff litigation in CV-19-302 complaint filed clearly a retaliation for plaintiff First Amendment's Right and denying plaintiff access to court under D.D.O.C OP-D3015 denying plaintiff his right to Sixth Amendment right to Counsel or represent himself through prison Library which Echo Maximum Unit denies per Bounds v. Smith Since May 18, 2018 and on Oct August 2019 Echo inadequate Law clerk was removed due to Exhibit 2a)1 - 3a)1 see Ex. 3a)5 DD170-6



Warden James Yates is directly responsible for assuring plaintiff a prison in custody of Oklahoma Department of Correction access to courts per DP-030115 Order from Oklahoma Court of Criminal Appeals PC-2018-819 on Jan. 8, 2019 pursuant Title 28 U.S.C. § 2244 is One year limitations period in which Law Library Supervisor Ms. Patterson rejected 1) because she is untrained to be in D.C.F. Law Library 2) because the assigned Law Library Clerk are untrained to assign another per DP-030115 3) Ms. Patterson directly retaliated based on Complaint filed plaintiff believe it was after Service of Summons..

On September 9, 2019 no trained Law Library Clerk was assigned to Echo Maximum Unit by Warden Yates, Deputy Warden Gentry neither had the General Counsel David Cincotta approved one this denies offenders access to courts and offender grievance process DP-030115, DP-090124 whereas a trained Law Library Clerk is suppose to be available for offenders Mon-Friday as well as a trained Law Library Supervisor. Since plaintiff has filed grievances Ex) 2-3) resulted in his overall condition becoming worse instead of better. Use of administrative remedies resulted in destroy R.I.S by Grievance Coordinator Underwood disregard proof provided by administrative reviewing Authority Knutson, plaintiff threaten with grievance restriction for logging grievance Underwood returned grievances on logged in order to cover up corruption within R.A., ARA; Therefore plaintiff is entitle to any relief requested from defendant denying plaintiff First, Sixth and Fourteenth Amendment Right at PCF and J.C.C.C denial of First Sixth Eighth and Fourteenth Amendment Right

Plaintiff Liberty is protected under due process and equal protection of Fourteenth from arbitrary action of government Liberty ~~and~~ is a statutory creation of the state. Warden arbitrary decision to exclude a student legal assistant is unconstitutional.

## VI. RELIEF REQUESTED

Briefly state what you want the Court to do for you. Do not make legal arguments or cite cases or statutes.

Plaintiff must first request the court to grant a preliminary injunction to prevent defendant from continued denied (access to court) discrimination and retaliatory behavior; In addition preliminary injunction to protect other offenders willing to provide affidavits in support of facts and D.C.F staff members in the middle of the directions of retaliatory action of deliberate direct reckless behavior disregard of the risk to James with abuse of authority to prevent legal victory in petitioning the government

## VII. PRISONER'S LITIGATION HISTORY

The "Three Strikes Rule" bars a prisoner from bringing a civil action or an appeal in forma pauperis in federal court if the prisoner has "on three or more occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

Have you brought any other lawsuits in federal court while a prisoner?



Yes

☐ No

If yes, how many? 3

Number each different lawsuit below and include the following:

- Name of case (including defendants' names), court, and docket number
- Nature of claim made
- How did it end? (For example, if it was dismissed, appealed, or is still pending, explain below.)
- Did the court assess a "Strike" or find the dismissal a "Prior Occasion" pursuant to 28 U.S.C. 1915 (g).

U.S. DIST. CT. OF WESTERN DIST OF OKLA. CIV-02-413-EA(C) EZELL V. COOKE  
42 U.S.C § 1983 DISMISSED DID NOT APPEAL. 2) U.S. DIST. CT. OF NORTHERN DIST. OF OKLA  
11-CV-400-TLK-TLM EZELL V. JEFF GATWOOD, SHAWN HICKEY 42 U.S.C § 1983 DISMISSED  
DID NOT APPEAL. 3) U.S. DIST. CT. OF EASTERN DIST. OF OKLA 6:12-CV-00133-FHS-SPS

EZELL V. WILKINSON 42 U.S.C. 1983 Appeal No. 13-7074 [MOTION ATTACHED]

Present EZELL V. DAMON CIV-19-302-JHP

**VIII. PLAINTIFF'S DECLARATIONS:**

I declare under penalty of perjury that the foregoing is true and correct. To the best of my knowledge, information, and belief, this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11 of the Federal Rules of Civil Procedure.

I agree to provide the Court Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Court Clerk's Office may result in the dismissal of my case.

  
Plaintiff's Signature

11-29-19  
Date

I further declare under penalty of perjury that I placed this complaint in the prison's legal mail system, with the correct postage attached, on the 29<sup>th</sup> day of Nov., 2019.

  
Plaintiff's Signature

11-29-19  
Date

NOTE 6112-CV-00133-FHS-SPS was filed based on denied [access to courts]  
After 2016 Echo Maximum Unit went back to same "practice" alleged in  
CV-00133 now in this Complaint D.C.F Echo Maximum Unit Law Library is  
inadequate Warden Yates and Deputy Warden Gentry encourage Deny access to  
court to prevent legal victory and retaliation).